

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SHELDON LOCKETT; MICHELLE)
DAVIS; AND CLYDE DAVIS,)
)
PLAINTIFFS,)
) CASE NO. 18-CV-5838-PJW
VS.)
)
COUNTY OF LOS ANGELES, A)
PUBLIC ENTITY; LOS ANGELES)
COUNTY SHERIFF'S DEPARTMENT, A)
LAW ENFORCEMENT AGENCY;)
SHERIFF JIM MCDONNELL; MIZRAIN)
ORREGO, A DEPUTY LOS ANGELES)
COUNTY SHERIFF; AND DOES 1)
THROUGH 100, INCLUSIVE,)
)
DEFENDANTS.)
_____)

PORTIONS OF THIS TRANSCRIPT ARE CONFIDENTIAL

REMOTE VIDEOTAPED VIDEOCONFERENCED DEPOSITION OF
MIZRAIN ORREGO
FRIDAY, MAY 22, 2020
VOLUME II

JOB NO. 4116350-1

REPORTED BY: TAMARA L. CARLSON

CSR NO. 12555

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PAGES 277 - 289 ARE CONFIDENTIAL AND ARE BOUND SEPARATELY

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1 REMOTE VIDEOTAPED VIDEOCONFERENCED DEPOSITION OF
2 MIZRAIN ORREGO, VOLUME II, TAKEN ON BEHALF OF THE
3 PLAINTIFFS AT 10:21 A.M., FRIDAY, MAY 22, 2020, AT
4 LOS ANGELES, CALIFORNIA, BEFORE TAMARA L. CARLSON,
5 CSR NO. 12555, CERTIFIED SHORTHAND REPORTER IN AND
6 FOR THE STATE OF CALIFORNIA.

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9
10 APPEARANCES OF COUNSEL:
11 FOR THE PLAINTIFFS:

12 THE SWEENEY FIRM
13 BY: JOHN E. SWEENEY, ESQ.
(APPEARING VIA VIRTUAL ZOOM)
315 SOUTH BEVERLY DRIVE
14 SUITE 305
BEVERLY HILLS, CALIFORNIA 90212
15 (310) 277-9595
JES@THESWEENEYFIRM.COM

16 --- AND ---

17
GLICKMAN & GLICKMAN, A LAW CORPORATION
18 BY: STEVEN C. GLICKMAN, ESQ.
(APPEARING VIA VIRTUAL ZOOM)
19 9460 WILSHIRE BOULEVARD
SUITE 330
20 BEVERLY HILLS, CALIFORNIA 90212
(310) 273-0829
21 SCG@GLICKMAN-LAW.COM

22
23
24
25 (APPEARANCES CONTINUED ON THE FOLLOWING PAGE)

1 MR. HURRELL: Objection. John, that 10:46
2 assumes a lot of facts that haven't been
3 established, specifically that Mr. Orrego arrested
4 him for the shooting, so...

5 BY MR. SWEENEY: 10:47

6 Q. You contacted, with your partner, the
7 person you -- that was eventually arrested for the
8 shooting on Oleander; is that true?

9 MR. ALTURA: Objection. Assumes facts and
10 lacks foundation. 10:47

11 MR. SWEENEY: Okay.

12 BY MR. SWEENEY:

13 Q. You can answer.

14 A. Our initial contact was not because we were
15 certain that he was the suspect for that shooting. 10:47

16 Q. Sir, this is not a trick question. I'm
17 just trying to get your testimony and confirm that
18 you -- because I want to -- it's going to lead to
19 another question.

20 You are the ones that first contacted 10:47
21 Mr. Lockett from your department; correct?

22 A. Correct.

23 Q. All right. So you did it based on a
24 description that you heard from the dispatcher;
25 true? 10:47

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1 EXAMINATION 11:26

2 BY MR. ALTURA:

3 [REDACTED]

4 [REDACTED]

5 [REDACTED] 11:27

6 [REDACTED]

7 [REDACTED]

8 MR. PONGRACZ: Objection. Third party

9 privacy.

10 Go ahead. 11:27

11 (The reporter requested clarification.)

12 MR. PONGRACZ: [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 BY MR. ALTURA: 11:27

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 MR. PONGRACZ: [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED]. 11:27

21 Go ahead.

22 [REDACTED] [REDACTED]

23 BY MR. ALTURA:

24 [REDACTED]

25 [REDACTED] 11:27

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1 [REDACTED] 11:27
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED] 11:28
6 [REDACTED]
7 [REDACTED]
8 A. Yes, sir.
9 Q. All right. You --
10 MR. HURRELL: 2018. 11:28
11 MR. ALTURA: Thank you, Mr. Hurrell.
12 BY MR. ALTURA:
13 Q. So that would be -- just to correct the
14 record, Mr. Orrego, it would be June, July, or
15 August of 2018? 11:28
16 A. Yes, sir, I believe so.
17 Q. And can you narrow that down any further to
18 one or two months?
19 A. I don't remember the exact months.
20 Q. I understand, sir. 11:28
21 How did you found -- how did you find out
22 about Mr. -- excuse me, Deputy Aldama's illness?
23 A. I don't recall. He may have called me or
24 we may have found out through his family.
25 Q. And did your getting the tattoo on your 11:29

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1 calf have anything to do with the fact that Deputy 11:29

2 Aldama was diagnosed with this serious illness?

3 A. 100 percent.

4 Q. And can you explain in what way that

5 diagnosis affected you -- your getting the tattoo? 11:29

6 A. Well, sir, we both gave our life, you know,

7 for -- to serve the community in Compton; and,

8 you know, I was no longer part of doing what I love

9 to do. You know, I was like jobless at home and my

10 partner was going through a very hard time, and I 11:29

11 believed that there was a possibility that he was

12 not going to make it anymore, so I wanted to have

13 something that I shared with him, and that was it,

14 sir.

15 Q. How long were you Deputy Aldama's partner 11:29

16 for?

17 A. I have known Deputy Aldama for a long time,

18 but partners in the same patrol vehicle, I'll say

19 approximately two years.

20 Q. And how long did you know Deputy Aldama 11:30

21 before that, as a deputy?

22 A. About ten years, sir.

23 (The nonconfidential portion of this

24 deposition continues on page 290.)

25

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1 STATE OF CALIFORNIA)
) ss.
2 COUNTY OF VENTURA)
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4

5 I, MIZRAIN ORREGO, hereby certify under
6 penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

8 Executed this ____ day of _____,
9 20____, at _____, California.

10

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MIZRAIN ORREGO, VOLUME II

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1 STATE OF CALIFORNIA)
) ss.

2 COUNTY OF VENTURA)

3 I, Tamara L. Carlson, C.S.R. No. 12555, a
4 Certified Shorthand Reporter of the State of
5 California, do hereby certify:

6 That the foregoing proceedings were taken
7 remotely at the time and place herein set forth;
8 that any witnesses in the foregoing proceedings,
9 prior to testifying, were duly sworn; that a record
10 of the proceedings was made by me using machine
11 shorthand, which was thereafter transcribed under my
12 direction; that the foregoing transcript is a true
13 record of the testimony given.

14 Further, that if the foregoing pertains to the
15 original transcript of a deposition in a Federal
16 Case, before completion of the proceedings, review
17 of the transcript [] was [] was not required.

18 I further certify I am neither financially
19 interested in the action nor a relative or employee
20 of any attorney or party to this action.

21 IN WITNESS WHEREOF, I have this date subscribed my
22 name.

23 Dated: June 3, 2020



Tamara L. Carlson

CSR No. 12555